

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	Case No. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC,	§	Chapter 11 (Subchapter V)
	§	
Debtor.	§	

**THE CONNECTICUT PLAINTIFFS’
WITNESS AND EXHIBIT LIST FOR EMERGENCY HEARING**

Judge	Hon. Christopher M. Lopez
Hearing Date	Monday, August 29, 2022
Hearing Time	1:00 p.m. (CST)
Party’s Name	David Wheeler, et al.
Attorney’s Names	Ryan Chapple, Randy Williams
Attorney’s Phone	512-477-5000
Nature of Proceeding	Hearing on Emergency Motion for Relief from the Automatic Stay [Dkt. 15]

WITNESS AND EXHIBIT LIST

David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker (collectively, the Connecticut Plaintiffs) hereby submit this Witness and Exhibit List in connection with the hearing on their *Emergency Motion for Relief from the Automatic Stay* (the Emergency Motion) [Dkt. 15] to be held on Monday, August 29, 2022 at 1:00 p.m. (Central Standard Time):

Counsel for the Connecticut Plaintiffs reserves the right to supplement, amend, or delete any witnesses or exhibits prior to the hearing. Counsel for the Connecticut Plaintiffs reserves the right to supplement the Witness and Exhibit List with new

witnesses and additional exhibits. Further, counsel reserves the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. Counsel for the Connecticut Plaintiffs further reserves the right to introduce exhibits previously admitted.

WITNESS LIST

- Alinor Sterling, Trial Counsel for Connecticut Plaintiffs;
- W. Marc Schwartz, Chief Restructuring Officer of Debtor;
- Any witness necessary to establish notice of the hearing on the Emergency Motion has been provided;
- Any witness necessary to rebut the testimony of any witness called or designated by any other parties;
- Any witness listed or called by any other party.

EXHIBIT LIST

**IF YOU SEEK A COPY OF THE EXHIBITS, YOU CAN ACCESS THEM BY
SUBMITTING A WRITTEN REQUEST TO ARLANA PRENTICE AT
APRENTICE@CSTRIAL.COM.**

Counsel for the Connecticut Plaintiffs may offer for admission into evidence any of the following exhibits at the hearing:

No.	Description	Offer	Obj	Date Admit	Disposition after trial
1.	<i>Erica Lafferty, et al. v. Alex Jones, et al.</i> Complaint				
2.	<i>William Sherlach v. Alex Jones, et al.</i> Complaint				
3.	<i>William Sherlach and Robert Parker v. Alex Jones, et al.</i> Complaint				
4.	Connecticut State Court Nov. 15, 2021 Default Ruling				
5.	Connecticut State Court Dec. 24, 2021 Order Striking Notice of Defenses				

6.	Supreme Court of Connecticut July 23, 2020 Decision				
7.	Jones Defendants' Oct. 19, 2020 Motion to Recuse				
8.	Connecticut State Court Dec. 24, 2021 Order Denying Motion to Recuse				
9.	Jan. 24, 2019 Sworn Interrogatories of Alex Jones				
10.	FSS Deposition Excerpts, Jun. 24, 2021				
11.	Jones Deposition Excerpts, Apr. 5, 2022				
12.	Jones Deposition Excerpts, Apr. 6, 2022				
13.	<i>Heslin, et al., v Alex Jones, et al.</i> Complaint				
	Any exhibits designated by other parties				
	Any exhibits necessary for rebuttal				

Respectfully submitted this 26th day of August 2022.

/s/ Ryan E. Chapple

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ATTORNEYS FOR
THE CONNECTICUT PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Witness and Exhibit List has been served on counsel for Debtor, Debtor, and all parties receiving or entitled to notice through CM/ECF on this 26th day of August 2022.

/s/ Ryan E. Chapple
Ryan E. Chapple